

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

TEXAS STATE LULAC; VOTO LATINO,

Plaintiffs,

v.

BRUCE ELFANT, in his official capacity as the
Travis County Tax Assessor-Collector;
JACQUELYN CALLANEN, in her official
capacity as the Bexar County Elections
Administrator; ISABEL LONGORIA, in her
official capacity as the Harris County Elections
Administrator; YVONNE RAMÓN, in her official
capacity as the Hidalgo County Elections
Administrator; MICHAEL SCARPELLO, in his
official capacity as the Dallas County Elections
Administrator; LISA WISE, in her official
capacity as the El Paso County Elections
Administrator,

Defendants.

Civil Action

Case No. 1:21-cv-00546-LY

**PLAINTIFFS' RULE 5.1 NOTICE
OF CONSTITUTIONAL QUESTION**

Plaintiffs TEXAS STATE LULAC and VOTO LATINO hereby submit the following notice of constitutional question pursuant to Federal Rule of Civil Procedure ("Rule") 5.1, and state as follows:

1. On June 22, 2021, Plaintiffs filed the above-captioned action. In their complaint, Plaintiffs allege that Senate Bill 1111 violates the First, Fourteenth, and Twenty-Sixth Amendments to the U.S. Constitution.

2. The parties to this action do not include the State of Texas, one of its agencies, or one of its officers or employees in an official capacity.

3. Plaintiffs will serve a copy of this notice and their complaint on the Texas Attorney General by certified mail and through an electronic address designated for this purpose, pursuant to Rule 5.1(a)(2).

Dated: June 22, 2021.

Respectfully submitted,

/s/ John R. Hardin

John R. Hardin

Texas State Bar No. 24012784

PERKINS COIE LLP

500 North Akard Street, Suite 3300

Dallas, Texas 75201-3347

Telephone: (214) 965-7700

Facsimile: (214) 965-7799

johnhardin@perkinscoie.com

Uzoma N. Nkwonta*

Kathryn E. Yukevich*

PERKINS COIE LLP

700 Thirteenth Street NW, Suite 800

Washington, D.C. 20005-3960

Telephone: (202) 654-6200

Facsimile: (202) 654-9996

unkwonta@perkinscoie.com

kyukevich@perkinscoie.com

Jonathan P. Hawley**

PERKINS COIE LLP

1201 Third Avenue, Suite 4900

Seattle, Washington 98101-3099

Telephone: (206) 359-8000

Facsimile: (206) 359-9000

jhawley@perkinscoie.com

*Counsel for Plaintiffs Texas State LULAC and
Voto Latino*

Domingo Garcia*

Texas State Bar No. 07631950

LAW OFFICE OF DOMINGO GARCIA PC

1111 West Mockingbird Lane, Suite 1200

Dallas, Texas 75247-5012

Telephone: (214) 941-8300

dgarcia@lulac.org

Luis Roberto Vera, Jr.

Texas State Bar No. 29546740

ATTORNEY AND COUNSELOR AT LAW

407 West Ware Boulevard

San Antonio, Texas 78221

Telephone: (210) 225-3300

lrqlaw@sbcglobal.net

Counsel for Plaintiff Texas State LULAC

**Pro Hac Vice Application Forthcoming*

***Pro Hac Vice Application Filed*